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Attorneys for the RKS Claimants

UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

In re:

PG&E CORPORATION,

- and -

PACIFIC GAS AND ELECTRIC
COMPANY,

Debtors.

Affects PG&E Corporation

Affects Pacific Gas and Electric Company

☒ Affects both Debtors

** All papers shall be filed in the Lead Case,
No. 19-30088 (DM)*

Case No. 19-30088 (DM) (Lead Case)
(Jointly Administered)

Chapter 11

**DECLARATION OF RICHARD A.
BODNAR IN SUPPORT OF THE RKS
CLAIMANTS' STATEMENT OF
POSITION WITH REGARD TO TAKING
DISCOVERY WHILE THE SECURITIES
CLAIMANT SUFFICIENCY
OBJECTIONS ARE PENDING**

Hearing Information:

Date: No Hearing Set

1 Pursuant to 28 U.S.C. § 1746, I, Richard A. Bodnar, under penalty of perjury, hereby
2 declare as follows:

3 1. I am a Partner at the law firm Rolnick Kramer Sadighi LLP ("RKS"), counsel to
4 the RKS Claimants. I submit this declaration in support of the RKS Claimants' Statement of
5 Position With Regard to Taking Discovery While the Securities Claimant Sufficiency Objections
6 Are Pending (the "Statement").

7 2. In June and July 2023, on behalf of the RKS Claimants, I supervised and
8 participated in negotiations between counsel for Reorganized Debtors and various other securities
9 claimants, which resulted in the Amendment and Objection Procedures for Securities Claims,
10 which was so ordered in the Court's July 28, 2023 Order Authorizing Amendment and Projection
11 Procedures for Securities Claims (the "Objection Procedures Order" or the "Order"). [Dkt. No.
12 13934].

13 3. I and my colleagues participating in these negotiations on behalf of the RKS
14 Claimants understood at the time we negotiated the procedures adopted in the Order that those
15 procedures would not allow for discovery until after the Court rendered decisions on the
16 Sufficiency Objections contemplated in the procedures. This was and remains consistent with our
17 intent and understanding of the Order.

18 I declare under penalty of perjury of the laws of the United States that the foregoing is true
19 and correct.

20
21
22 Executed on January 16, 2024

23 By: /s/ Richard A. Bodnar
24 Richard A. Bodnar